

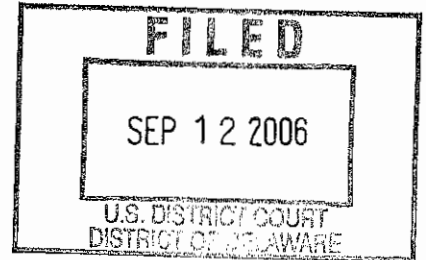
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Charles P. Jones,  
Plaintiff

v.

Thomas Carroll, Mirsha Profaci,  
Peter Forbes, and Joe Pomella,  
Defendants.

Civil Action NO.  
06-129 KAS



Plaintiff's Rule 26 Initial Disclosures

Scanned- BD 9/12/06

Plaintiff Charles P. Jones disclose the following information in compliance with Rule 26(a)(1) of the Federal Rules of Civil Procedure and the scheduling order in this matter. These disclosures are based on information reasonably available to Plaintiff as of this date. Continuing investigation and discovery may alter these disclosures. Plaintiff reserve the right to supplement the information disclosed below if additional information becomes available.

By making these disclosures, Plaintiff does not represent that he is identifying every document, tangible thing, or witness possibly relevant to this claim. Nor does the Plaintiff waive his rights to object to the production of any document or tangible thing disclosed on the basis of any privilege, the work-product doctrine, relevancy, undue burden or any other valid objection. Plaintiff's disclosures represent a good faith effort to identify

information that he reasonably believes is required by Rule 26 (a.) (1).

Plaintiffs' disclosures are made without waiver of: 1) the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or other proper grounds; 2) the right to object to the use of any such information, for any purpose, in whole or in part, in any other action; and 3) the right to object on any and all proper grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures.

All of the disclosures set forth below are made subject to the above objections and qualifications.

(A.) Individuals likely to have discoverable information in support of Plaintiffs' case.

1. Wilfred Beckles, Department of Correction
2. Jaime Meadows, Jr. Department of Correction
3. Joseph S. Simon, Department of Correction
4. Timothy Timmons, Department of Correction
5. Kevin Hopkins, Sr. Department of Correction
6. Joseph Pomella, Department of Correction
7. Monica Watson, Department of Correction
8. Derrick Washington, Department of Correction
9. Alisha Profaci, Department of Correction
10. Peter Forbes, Department of Correction
11. Garnell Stokes, inmate, Department of Correction

12. Kaima Scott, Department of Correction
  13. Anibal Melendez, Inmate, Department of Correction
  14. George Davis, Inmate, Department of Correction
  15. Gloria Watson, Registered Nurse Correctional Medical Services
  16. Kent County Paramedics
  17. Ronald Pierce, Inmate, Department of Correction
  18. Warren J. McNeill, Inmate, Department of Correction
  19. Charles P. Jones, Inmate, Department of Correction
- In addition, Plaintiff reserve his rights to Rule 26(E) to identify additional witnesses.

(B.) Documents that may be used to support Plaintiff's case:

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1. Contents of Inmate Anibal Melendez institutional file, including but not limited to disciplinary, inmate grievance, classification, medical records including any and all Mental Health Records, "diagnosis and treatments made outside of and within the institution pending Criminal Case(s) and institutional records related documentation contained therein.

2. All medical examination reports and records applicable to the Plaintiff made outside and within while incarcerated within the custody of the Department of Correction.

In addition, Plaintiff reserve his rights, pursuant to Rule 26(E) to identify additional documents.

Plaintiff further reserve the rights to identify and utilize any further documents that may become available by the defendants.

(C.) EXPERTS and their Opinions: Damage Computations

Plaintiff have not yet retained any experts, but reserve the right to do so, and will supplement this response as required by Rule 26 (a).

(D.) Insurance Agreements in Force:

Correctional Medical Services.

Plaintiff discloses that all medical bills for injury are being covered by Correctional Medical Services while Plaintiff is incarcerated.

Dated: 9-2-2006

Charles P. Jones

Charles P. Jones

#00228197

Delaware Corr. Center

1181 Paddock Rd.

Smixton Delaware 19977

Certificate of Service

I Charles P. Jones, hereby certify that I have served a true

And correct cop(ies) of the attached: Plaintiffs' Rule 26 Initial  
Disclosures upon the following  
parties/person (s):

TO: Ophelia M. Waters  
Deputy Attorney General  
820 N. French Street  
6th Floor  
Dilmington, Delaware 19801

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

TO: Clerk  
District Court  
Lockbox 18  
Dilmington, Delaware  
19801

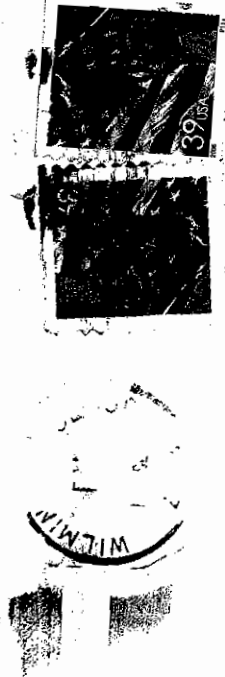
TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 2nd day of September, 2006



IM Charles P. Jones  
SBI# 228197 UNIT T-2  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



Clerk of the Court  
United States District Court  
J. Caleb Boggs Federal Building

844 N. King Street  
Wilmington, DE

*Lock Box 18*

19801